

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LATOYA WARE,)	
)	
Plaintiff,)	
v.)	Case No. 22-cv-02336
)	
KIM FOXX, COOK COUNTY)	Hon. Franklin U. Valderrama
STATE’S ATTORNEY, COOK COUNTY, and)	
unknown county employees,)	
)	
Defendants.)	

**DEFENDANT COOK COUNTY’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

NOW COMES the Defendant, Cook County, through its attorney, Kimberly M. Foxx, State’s Attorney of Cook County, by her assistant David A. Adelman, pursuant to Fed. R. Civ. 6(b)(1)(A), and hereby moves this Honorable Court for an extension of time in which to answer or otherwise plead to Plaintiff’s Complaint. In support of this motion, Defendant Cook County states as follows:

1. On May 4, 2022, Plaintiff filed her Complaint. [Docket. No. 1].
2. Defendant Cook County’s responsive pleading is due on May 27, 2022. [Dkt. #7].
3. Undersigned Defense Counsel was just assigned to this matter and is evaluating possible defenses for preparation of a responsive pleading.
4. Counsel for co-Defendant Kim Foxx filed an Unopposed Motion for an Extension of Time to Answer or Otherwise Plead on May 25, 2022, which is currently pending, seeking an extension to July 11, 2022. [Dkt. #9].
5. Defendant Cook County requests a similar extension of time, to July 11, 2022, to answer or otherwise plead to the Complaint.
6. Defendant Cook County has conferred with Plaintiff’s Counsel by email and

Plaintiff's Counsel does not oppose this request.

7. This is Defendant Cook County's first request for an extension of time to answer or otherwise plead to the Complaint.

8. This request is made in good faith and will not prejudice any party.

WHEREFORE, Defendant Cook County respectfully requests that this Honorable Court extend Defendant Cook County's deadline to answer or otherwise plead to the Complaint to July 11, 2022, and for all other appropriate relief.

Dated: May 26, 2022

Respectfully submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

By: /s/ David A. Adelman
David A. Adelman
Assistant State's Attorney
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CERTIFICATE OF SERVICE

I, David A. Adelman, hereby certify that on May 26, 2022, I have caused a true and correct copy of the foregoing motion be sent via e-filing to all counsel of record in accordance with the rules regarding the electronic filing and service of documents.

/s/ David A. Adelman
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